

EXHIBIT 1
REDACTED VERSION OF
DOCUMENT
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

No. 3:17-cv-00939-WHA

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ
Palo Alto, California
Tuesday, August 22, 2017
Volume II

Reported by:

CATHERINE A. RYAN

CMR, CRR, CSR No. 8239

Job No. 2685937

PAGES 188 - 317

Page 188

1 Q Do you recall talking about that? 18:15:44

2 A Yes, I do.

3 Q What did you mean by that?

4 A So for -- for a long time, like, Anthony's

5 responsibilities were to manage the laser team, but 18:15:53

6 he was rarely at work, and he -- and, you know, he

7 left a lot of the -- you know, some responsibility

8 of even like, you know, evaluating some people on

9 the team and some of the responsibility were

10 directly -- I mean, like, directly his 18:16:14

11 responsibility as people manager on to me or other

12 people on the team. He was so -- I know he was so

13 -- he also had other businesses, you know, other,

14 like, ventures and opportunity with Sebastian Thrun.

15 Q What were those other ventures? 18:16:33

16 A So I know they were playing with flying

17 cars and flying things. Like, at some point he was

18 doing, like, [REDACTED]

19 [REDACTED]

20 [REDACTED]. He also, like -- other than that, there was 18:16:57

21 that -- that instance where I learned about, you

22 know, like, the -- how is it called? Odin Wave, and

23 Anthony's involvement in that was pretty clear, I

24 think.

25 Q What do you mean by that? 18:17:14

A The company was operating from his building. The company was founded by -- not founded, registered by his attorney. I mean, it's not direct evidence, but I don't know what you mean.

18:17:16

5	Q	Do you know anything else about Odin Wave?	18:17:34
---	---	--	----------

6 A His friend -- his friend was -- Ognen, his
7 friend, was leading the company.

8 Q Do you know anything else about the
9 company?

10 A I know that they -- they tried to 18:17:47
11 manufacture parts that 510 had manufactured
12 before -- had designed.

13	Q	Like what?
----	---	------------

14	A It was [REDACTED] for our first	
15	styler.	18:17:59

16 Q I'm sorry. I didn't understand that.

17 A Sorry. It was [REDACTED].

18 MR. JAFFE: [REDACTED]

19 BY MR. CHATTERJEE:

20 Q [REDACTED] 18:18:05

21	A	Yes.
----	---	------

22 Q Got it. And how did you come to learn of
23 that?

24	A One of our supplier called Gaetan saying	
25	that he -- another company, Odin Wave, had asked	18:18:21

1 them to manufacture that parts, and the part was
2 extremely similar to the part we had designed, and
3 this is a very specific part. The shape was very
4 specific, and so --

18:18:24

5	Q	And so when you learned of that, what did	18:18:35
6		you do?	

7 A I confronted Anthony. He told me things
8 in line of -- "I was not involved. I'm not directly
9 financially involved with this." I don't remember
10 exactly what he said. "I don't have any financial 18:18:52
11 relationship in that company."

12 So the, I mean, first thing I did was
13 searching on the web to find who had registered the
14 company, who was the CEO, and things like that,
15 their address, and all of these things, and then I 18:19:03
16 confronted Anthony, and Anthony, like, gave me
17 Ognen's phone number, and I called Ognen -- Gaetan.
18 I called Ognen.

19	Q	And what happened in that conversation	
20		with Ognjen?	18:19:18

21 A The -- I don't remember the -- I remember
22 we discussed, like, why -- I think I asked him why
23 they were making these parts. It didn't seem right.
24 I think he offered me to go visit their company. I
25 said I was not interested. At the end, you know,

18:19:41

1 the -- the -- I think the tone of the discussion was 18:19:48
2 I didn't want -- I said I didn't want any more
3 trouble from this, and so that was kind of the end
4 of the discussion.

5 Q Did you -- did you ask Ognen if -- what 18:20:02
6 Anthony's relationship to the company was?

7 A I don't remember if I asked that. If I
8 asked that then, I probably didn't get an answer
9 because I didn't remember.

10 Q So you don't remember asking or getting an 18:20:16
11 answer?

12 A No, I don't.

13 Q When was this?

14 A I think it was in 2012, 2013 time frame.
15 I don't remember the -- I don't remember the exact, 18:20:32
16 like -- the exact time of that.

17 Q How much time did you spend kind of
18 looking up all this stuff on the web?

19 A It was probably a few hours.

20 Q Did you tell anyone inside of Google about 18:20:45
21 this?

22 A Gaetan, yeah, and I didn't tell anybody
23 else.

24 Q But you didn't tell Mr. Urmson?

25 A I didn't tell Mr. Urmson. 18:20:54